

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

RYAN HOUCK,)	CASE NO. 1:22-cv-01315
)	
Plaintiff,)	
)	
v.)	
)	
CENTRAL INDIANA SOARING, INC.;)	
A.K.A. SOAR INDY,)	
)	
Defendant,)	

NOTICE OF REMOVAL

Defendant, Central Indiana Soaring, Inc.; a.k.a. Soar Indy, hereby removes this case from the Marion County Superior Court for the State of Indiana to the United States District Court for the Southern District of Indiana, Indianapolis Division. The factual and legal grounds supporting this Notice of Removal are described below.

1. On March 23, 2022, Plaintiff filed a Complaint in the Marion County Superior Court against the Defendant which alleged violations of Title III of the Americans with Disabilities Act, 42 U.S.C. § 12101 *et seq.* This Complaint was served on Defendant via U.S. mail on June 6, 2022.

2. This Court has original jurisdiction over civil actions arising under the Constitution and laws of the United States. 28 U.S.C. § 1331. Thus, this Court has original jurisdiction over this civil action because Plaintiff's claims arise under the Constitution and laws of the United States.

3. Defendant may remove this civil action because it was brought in State court when this Court had original jurisdiction over this action. *See* 28 U.S.C. § 1441(a).

4. Further, this Court has supplemental jurisdiction over Plaintiff's state-law claims. 28 U.S.C. § 1367.

5. Indeed, federal law grants Defendant the option of removing an entire action when this Court has original jurisdiction over the action. *See* 28 U.S.C.A. § 1441(c).

6. This notice of removal is being filed within 30 days of Defendants' receipt of the Plaintiff's Complaint and the Defendant shall submit copies of all process, pleadings, and orders served upon them pursuant to 28 U.S.C. § 1446(b).

7. There are currently no pending motions.

WHEREFORE, the Defendant, Central Indiana Soaring, Inc.; a.k.a. Soar Indy hereby removes this civil action from the Marion County Superior Court, Cause Number 49D04-2203-PL-009543 to the United States District Court for the Southern District of Indiana, Indianapolis Division.

Respectfully submitted,

/s/ Alexander P. Will

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of July, 2022, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties via U.S. Mail to the following:

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